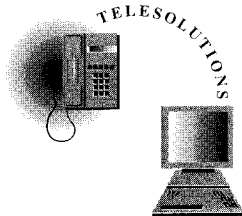


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Ryan B. Palmer, Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Date: August 17, 2016

Re: DA No. 18-860, released July 29, 2016 and Re: CC Docket 02-6

Dear Mr. Palmer:

This is a Petition for Reconsideration of our DENIED Bear Form 472 Invoice Extension Request for Community Consolidated School District #180.

We submitted the Bear Invoice Extension Request late, past the regular deadline and, per the new E-rate Modernization Order and rules, were DENIED.

We understand the rules. We were late in our filing. We made a mistake and error and are very sorry. We are an E-rate professional consulting firm and are embarrassed by this oversight and mistake. We do cite many of the arguments made in the State E-rate Coordinators Alliance's (SECA's) general "Petition for Reconsideration and Petition for Omnibus Waiver of Invoice Deadline Regulation and petition for Rulemaking to Revise Invoice Deadline Regulation". File SLD-963751.

Respectfully, we echo the SECA contention that there were enormous "challenges" and that "even experienced practitioners" which we are, "are challenged to master all of the changes arising from the Modernization Orders".

It is my contention that humans and machines are not perfect and will make a mistake or (in the case of a machine) suffer a glitch. We made a mistake by missing one FRN out of hundreds of FRNs and the result will be a very poor school district being denied \$32,617.62. The service was for FRN #2620110 for AT&T local and PRI service line for \$3,020.15 per month or \$36,214.80 annually. \$36,214.80 (pre-E-rate discount @ a 90% E-rate discount = \$32,617.62.)

Community Consolidated School District 180 is a very poor elementary school district that participates in the Community Eligible Provision, or CEP program. The school district has nearly 100% poverty level children with all students served lunches and is eligible for the highest Internet E-rate discount level of 90%.

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I am a member of the E-rate Management Professional Association (EMPA) and subscribe to its code of ethics while interacting in the E-rate program. We understand the rules and have been working in the E-rate program the entire twenty years of its existence. I must say that 2015 was an unprecedented year with once in 20-year challenges and consequently the E-rate due date was extended over two months to May 26, 2016 due to the EPC Portal and E-rate 470 and 471 Form challenges and difficulties.

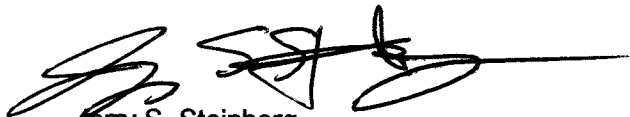
We are thrilled that the E-rate program was continued for five more years and the schools now ALL have a budget and can benefit from increased Internet access and bandwidth AND needed infrastructure. And we are happy to work with the programs and report glitches and issues in order for all to file forms more effectively and efficiently.

Our request is simple: PLEASE consider our petition for reconsideration of our late Bear Form Extension request and the Bear Form for an application that was legitimately approved via the 471 Form and Funding Commitment Decision Letter, or FCDL, and was missed originally due to human error due to what I believe were extenuating challenges of the new EPC Portal and Forms.

We are fore-warned and understand that there is no room for errors and missed deadline. We get this very loudly and very clearly. We plan to institute a new tracking system in order to prevent this type of error from happening in the future and to ensure that ALL forms and invoices are submitted way before the deadline in the future.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'JS Steinberg', with a long horizontal line extending to the right.

Jerry S. Steinberg
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